

NOV 14 2022

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[1] CHARLES MCGLOTHER  
a/k/a "CHUCK"

[2] KAREN BAILEY  
a/k/a "KAY"

[3] CHARLES SUMNER  
a/k/a "PONYTAIL"

NO. 3:22-cr-00367

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) 18 U.S.C. § 922(g)(1)  
) 18 U.S.C. § 924(c)  
) 18 U.S.C. § 1591(a)(1)  
) 18 U.S.C. § 1591(a)(2)  
) 18 U.S.C. § 1594(c)  
) 21 U.S.C. § 841(a)(1)  
) 21 U.S.C. § 846  
)

**INDICTMENT**

COUNT ONE

THE GRAND JURY CHARGES:

Beginning not later than in or about December 2012, and continuing through on or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER**, a/k/a **"CHUCK,"** [2] **KAREN BAILEY**, a/k/a **"KAY,"** and [3] **CHARLES SUMNER**, a/k/a **"PONYTAIL,"** did knowingly and intentionally, in and affecting interstate commerce, combine, conspire and confederate with each other, and with others known and unknown to the Grand Jury, to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit persons, and benefit financially and by receiving a thing of value, from participation in a venture which would engage in such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and a combination of such means, would be used to cause persons to engage in commercial sex acts, in violation of Title 18 United States Code, Section 1591(a).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Beginning not later than on or about July 21, 2021, and continuing through on or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** did combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute controlled substances, including 5 grams or more of methamphetamine, a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a quantity of a mixture and substance containing a detectable amount of cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” all Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about December 2012, and continuing through on or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 1, knowing and in reckless disregard of

the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about December 2012, and continuing through on or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** did knowingly benefit, financially and by receiving anything of value, from participation in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means Victim 1, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(2) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about February 2016, and continuing through in or about September 2019, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about February 2016, and continuing through in or about September 2019, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** did knowingly benefit, financially and by receiving anything of value, from participation in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means Victim 2, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(2) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about September 2017 and continuing through in or about January 2020, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** knowingly, in and affecting interstate commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 3, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 3 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

Beginning not later than in or about September 2017 and continuing through in or about January 2020, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a “CHUCK,”** [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** did knowingly benefit, financially and by receiving anything of value, from participation in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining, advertising, maintaining, patronizing, and soliciting by any means Victim 3, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(2) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

On or about July 21, 2021, in the Middle District of Tennessee, [2] **KAREN BAILEY, a/k/a “KAY,”** did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as “crack cocaine,” and a quantity of a mixture and substance containing a detectable amount of methamphetamine, both Schedule II controlled substances.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

On or about December 9, 2021, in the Middle District of Tennessee, [2] **KAREN BAILEY, a/k/a “KAY,”** and [3] **CHARLES SUMNER, a/k/a “PONYTAIL,”** did knowingly

and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES:

On or about March 28, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a "CHUCK,"** aided and abetted by another, did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, and a quantity of a mixture and substance containing a detectable amount of methamphetamine, both Schedule II controlled substances.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

On or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a "CHUCK,"** and [2] **KAREN BAILEY, a/k/a "KAY,"** did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, and a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), both Schedule II controlled substances.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES:

On or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a "CHUCK,"** knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiring to possess with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as charged in Count Two of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES:

On or about March 31, 2022, in the Middle District of Tennessee, [1] **CHARLES MCGLOTHER, a/k/a "CHUCK,"** knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Taurus, model PT92AF, 9mm caliber pistol, and the firearm was in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

FORFEITURE ALLEGATION

The allegations contained in this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

Upon conviction of any one of Counts One or Three through Eight, [1] **CHARLES MCGLOTHER a/k/a "CHUCK,"** [2] **KAREN BAILEY a/k/a "KAY,"** and [3] **CHARLES SUMNER a/k/a "PONYTAIL,"** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1594(d)(1) and (2):

- (1) any property, real or personal, that was involved in, used or intended to be used to commit or to facilitate the commission of such violation, and any property traceable

to such property; and

- (2) any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property

including but not limited to a money judgment representing the value of the property, real or personal, involved in, used or intended to be used to commit or to facilitate the commission of such violation(s), and any property traceable to such property and the value of the property, real or personal, constituting or derived from, any proceeds the person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

Upon conviction of any one of Counts Two or Nine through Twelve, [1] **CHARLES MCGLOTHER a/k/a "CHUCK,"** [2] **KAREN BAILEY a/k/a "KAY,"** and [3] **CHARLES SUMNER a/k/a "PONYTAIL,"** shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853(a)(1):

- (1) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and
- (2) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

including but not limited to a money judgment representing the value of the property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and the value of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

Upon conviction of Count Thirteen or Fourteen of this Indictment, [1] **CHARLES MCGLOTHER a/k/a "CHUCK,"** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), any firearm or



ammunition involved in or used in any knowing violation of the offense, or intended to be used in the offense, including a Taurus, model PT92AF, 9mm caliber pistol and related ammunition.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of [1] **CHARLES MCGLOTHER a/k/a "CHUCK,"** [2] **KAREN BAILEY a/k/a "KAY,"** and [3] **CHARLES SUMNER a/k/a "PONYTAIL":**

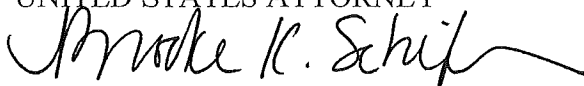
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property, and it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of [1] **CHARLES MCGLOTHER a/k/a "CHUCK,"** [2] **KAREN BAILEY a/k/a "KAY,"** and [3] **CHARLES SUMNER a/k/a "PONYTAIL,"** up to the value of said property listed above as subject to forfeiture.

A TRUE BILL

FOREPERSON

MARK H. WILDASIN  
UNITED STATES ATTORNEY



BROOKE K. SCHIFERLE  
ASSISTANT UNITED STATES ATTORNEY